

Submission – Royal Incorporation of Architects in Scotland

17-11-2025

Dear Ms Burgess,

Building (Scotland) Amendment Regulations 2025 (SSI 2025/312)

As part of the Committee's consideration of the Building (Scotland) Amendment Regulations 2025, the Royal Incorporation of Architects in Scotland (RIAS) wishes to provide comments on the proposed requirement for fire safety in future hotel conversions. Our response reflects the profession's commitment to safeguarding life while ensuring that regulatory changes are practical, proportionate, and effective.

The RIAS fully supports the principle that fire suppression systems should be installed in complex historic properties where fire prevention measures may not exist or, if they do, are likely to be less effective because of the property's layout and the materials used. Doing so will help prevent a recurrence of the tragic events at Cameron House and the New County Hotel.

A key issue is where the threshold for requiring such a system should be set. We understand this was the subject of considerable discussion within the Scottish Government's expert group. Our view is that the threshold must be based on the number of rooms capable of providing sleeping accommodation, rather than the headline number of rooms used for these purposes. This is because two-room suites with bed-settees might otherwise fall outside the requirement, placing occupants at risk. We also believe that capable is a better term than used for, as it covers potential future use as well as current or past use.

If it would be helpful, we would be happy to provide further detail and work with the Committee and officials to ensure the regulations are optimised to achieve their intended safety outcomes.

Yours sincerely

Stuart Hay

Head of Outreach

The Royal Incorporation of Architects in Scotland